



United States Department of Justice
Consumer Protection Branch
450 Fifth Street, N.W., Suite 6400
Washington, D.C. 20001

By Electronic Mail

July 11, 2025

The Honorable Gerald J. Pappert
11614 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: *United States of America v. AmerisourceBergen Corporation et al.*
(E.D. Pa. Civ. A. No. 22-cv-5209-GJP)

Dear Judge Pappert:

The United States and Defendants write to jointly request an extension to the remaining deadlines set forth in the Scheduling Order (ECF No. 72). Throughout the extensive discovery process, the United States and Defendants have regularly met and conferred to resolve disagreements, largely avoiding court involvement, as they navigate a complex case involving hundreds of thousands of controlled substances orders placed with Defendants. Due to the volume of relevant discoverable materials, the parties now also agree that they cannot complete production of these materials by the current July 25, 2025 production deadline.

Accordingly, the parties jointly propose an approximately four-month extension to the document production deadline and a similar extension to subsequent deadlines thereafter. The requested extension accounts for discovery negotiations that continue to this day. The parties have each agreed to produce documents from dozens of custodial and non-custodial sources and continue to negotiate additional document sources as discovery develops. The parties have taken a close look at what remains to be accomplished and estimate in good faith that four months is the additional time needed to complete productions of materials, including from both recently agreed-upon document sources as well as previously agreed-upon sources.

The parties also jointly propose adding an extra month following the document production period to allow more time for depositions. The parties have looked at the expected number of depositions and believe such an extension will permit the parties enough time to analyze the documents produced, prepare witnesses, and schedule the dozens of anticipated depositions.

The parties therefore respectfully ask the Court to enter the enclosed proposed order extending the remaining discovery deadlines as set forth in the proposed order and resulting in the following deadlines:

The Honorable Gerald J. Pappert

July 11, 2025

Page 2 of 2

1. Documents, other than those subject to motions to compel or supplementations required by Rule 26(e), shall be produced on or before **Friday, November 28, 2025** (previously Friday, July 25, 2025).
2. Any disputes regarding requests for production shall be raised with the Court on or before **Friday, January 30, 2026** (previously Friday, September 26, 2025).
3. Fact discovery shall be completed on or before **Friday, June 12, 2026** (previously January 9, 2026).
4. All expert discovery, including depositions, shall be completed on or before Friday, **January 15, 2027** (previously September 18, 2026).

The parties appreciate the Court's consideration of this request and, should the Court desire, are available to attend a status conference to discuss it.

Respectfully,

/s/ John F. Schifalacqua
John F. Schifalacqua
Trial Attorney
U.S. Department of Justice
Consumer Protection Branch

cc: Counsel of Record (by e-mail)

Enclosure